

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

IN CLERKS OFFICE
FILED

United States of America
v.
Martin S. Gottesfeld
Defendant pro se

2019 JAN -7 PM
Case No. U.S. DISTRICT CR-1:18-CR-10305 NMG
DISTRICT COURT OF MASS.

MOTION TO UNSEAL

Defendant Martin S. Gottesfeld (herein "defendant"), acting pro se over his preserved objection to such, hereby moves The Honorable Court via the public docket (neither ex parte nor under seal) to unseal and to make available to the general public via PACER all prior motions made under seal and/or ex parte by his prior court-appointed defense attorneys seeking funding and other resources from The Honorable Court for their work on the instant case as well as any resulting responses/orders made by The Honorable Court.

In making this motion, the defendant hereby waives his attorney-client privilege to any such information and asserts the rights of himself and of the public to a public trial.

The defendant also wishes to note, respectfully, that he is aware that such information need not be unsealed in order for him to obtain it and use it for his own

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purposes, such as pursuing a future IAC claim or other pending litigation in another venue. However, the defendant believes that the interest of the public in this matter is compelling and he feels no need for the continued secrecy of this information.

In particular, the defendant was recently made aware that one of his prior appointed attorneys billed The Honorable Court (and therefore the American public as well) approximately \$2,700 for document reproductions which were never used. The defendant believes that the public has a vested interest in being able to ascertain other expenses for which this attorney either was reimbursed or sought to be reimbursed at taxpayer expense.

The defendant also wishes to note that it recently came to his attention since he mailed his recent affidavit pursuant to 28 U.S.C. § 144 that another prior attorney who had been appointed to represent him and who did not disclose a significant and direct financial conflict of interest (please see D.E. 140) closed his legal practice "permanently" on or about December 6th, 2018. The defendant believes that the general public and perhaps specifically other former-clients of this attorney, other members of the judiciary, and perhaps the IRS may each have compelling interests in the billing history between this attorney and The Honorable Court and that they would be unlikely to receive this information through other means.

Finally, since such information is so rarely disclosed,

not) in 100% of the
cases, it cannot be done in 100% of the
cases. It's not always possible to do so.
However, if the defendant has a history of
committing offenses, it is more likely that he
will commit another offense in the future.
This is because offenders tend to repeat their
offenses. This is known as "recidivism".
It is important to consider the defendant's
history when determining whether or not to
recommend probation. If the defendant has a
history of committing offenses, it may be
more appropriate to recommend probation
rather than imprisonment. However, if the
defendant has a history of committing
offenses, it may be appropriate to recommend
imprisonment rather than probation.
In addition, it is important to consider the
defendant's current circumstances. If the
defendant is currently facing financial
difficulties, it may be more appropriate to
recommend probation rather than imprisonment.
However, if the defendant is currently
facing financial difficulties, it may be
appropriate to recommend imprisonment
rather than probation.
Finally, it is important to consider the
defendant's attitude towards the offense.
If the defendant shows remorse and is
willing to take responsibility for their
actions, it may be more appropriate to
recommend probation rather than imprisonment.
However, if the defendant shows no
remorse and is unwilling to take
responsibility for their actions, it may be
appropriate to recommend imprisonment
rather than probation.

There would be an additional educational value, both to the general public as well as to practicing attorneys and to institutions of higher learning, which train paralegals, accountants, and attorneys, in having a publicly-available and authentic set of such data from a real Federal CFAA case as an example.

The defendant offers an affidavit (please see Exhibit A attached hereto) in support of this motion, his prior motion to unseal (please see D.E. TBD), and his prior motion for hearing transcripts (please see D.E. TBD).

Respectfully mailed on January 2nd, 2019,

M.S.G

Martin S. Gottesfeld, pro se
RCCF ID 7122S, Unit H1 Cell 23S
26 Long Pond Road
Plymouth MA 02360

It's a good idea to have the best possible equipment, but you don't
have to buy the best equipment to get the best results. In fact,
you can often get better results with less expensive equipment.
For example, if you're looking for a new camera, consider buying
a used one instead of a new one. Used cameras are often
cheaper than new ones, and they can be just as good.
Another tip is to take your time when you're shooting. Don't
try to take too many pictures at once, or you'll end up with a lot
of bad shots. Instead, focus on one subject at a time, and take
as many pictures as you need to get the best possible results.
Finally, remember that practice makes perfect. The more you
shoot, the better you'll become. So don't be afraid to experiment
and try new things. You never know what you might discover.

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WFO AM 14 16

CERTIFICATE OF SERVICE

I, Martin S. Gottesfeld, pro se, hereby certify
that on January 2nd, 2019, I served the foregoing document(s)
will be mailed to Assistant U.S.
Attorney David D'Addio.

M.S.G.

Martin S. Gottesfeld
Pro Se

Affidavit

I, Martin S. Gottesfeld, do hereby affirm that the following is true to the best of my knowledge, information, and belief on this 2nd day of January, 2019:

1. I am the sole defendant in the case of 16-cr-10305 in U.S. District Court in Boston, Massachusetts (herein "the case").

2. I hereby waive my attorney-client privilege to the confidentiality of 1) any and all ex parte hearings which have been conducted in the case while my attorneys and I have been present; 2) any and all exhibits to motions to withdraw which were filed under seal and/or ex parte by any of my previous attorneys, specifically any such exhibits to D.E. 130, 214, 241, 254, 307, and/or 335; 3) any motions for the prepayment or reimbursement of costs or for other resources filed by my previously-appointed attorneys in relation to the case, and any resulting orders by The Honorable Court.

Signed under penalty of perjury,

Martin S. Gottesfeld



The Commonwealth of Massachusetts
On this 2 day of JANUARY 2019,
before me, the undersigned notary public, personally appeared

MARTIN GOTTESFELD gai 1/20
providing to me through satisfactory evidence of identification, which was
to be the person whose name is signed on the preceding or attached document who swore
or affirmed to me that the contents of the document are truthful and accurate to the best of
his/her knowledge and belief.



ROBERT J. LALIBERTE, Notary Public
My Commission Expires May 2, 2019

For a full list of the 100 best films of all time, visit [AOL.com](#).

(*Caribaea*) *strobilacea*

~~bottom of Kingbird - worth our while to go~~

I flew 3000' over the coast south of the lake and

at 10000 ft. It will be very difficult to get up

After the first two days of the study, the subjects were asked to return to the laboratory for a second visit.

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Page 9 of 10

As with all other cases, the more the better.

37. *Thlaspi glaucum* L. Benth.

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10. *What is the name of the author of the book you are reading?*

July 27, 1969 P

<http://www.comptechkids.com>

THE COUNCIL OF MUSICAL CENSURE

Explain how the nervous system is able to produce voluntary movement.

 ROBERT J. LABERGE, Notary Public
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